

11 9 0006

June 1, 1993



Ms. Elizabeth Davis
Office of Regional counsel
U.S. EPA - Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: John P. Saad & Sons Superfund Site - Nashville, Tennessee

Dear Beth:

Thank you for the opportunity for the Saad Site Steering Committee to present its findings and recommendations from the Phase II Removal Action/Field Investigation at the Saad Site. Our discussion on at our April 14 meeting was both productive and worthwhile. Your input and cooperation are sincerely appreciated.

We want to take this opportunity to restate, summarize and clarify the major points presented by the Steering Committee and discussed at the meeting.

The Steering Committee has fully complied with both the 1990 and 1992 AOC's regarding removal activities at the Site. More than 500 tons of material have been removed from this site and properly disposed of. This included both hazardous and non-hazardous wastes from surface and subsurface areas of this 0.4 acre site. All materials that were the basis for the HRS DC score that resulted in removal activities have been removed. This potential imminent threat has been eliminated. The field investigation demonstrates that we are left with a very small parcel of property with sporadic contamination of the vadose zone, primarily consisting of oil product waste material (TEX), a perched water condition on and around the site at a depth of approximately 6 feet below ground surface, a vadose zone (and perched water area) composed of 80 to 90% boulders and rubble fill, and the presence of off-site contamination from other sources.

It is a well documented fact that contamination of soils and groundwater in the region predates the John P. Saad operations. Discharges to soils and surface waters on adjacent properties have been reported as recently as 1989 (6 years after the Saad operations ceased). These other sources are currently being handled by TDEC under agreed orders. It is very important that the 0.4 acre Saad Site is placed in perspective with the surrounding hundreds of acres currently being investigated by TDEC. This is especially important in establishing ARAR's, which should seek consistent area standards established by a single regulatory entity. TDEC is the logical entity to regulate Saad Site activities from this point forward. As was presented at our meeting, the Steering Committee is fully committed, both

technically and financially, to remain involved under the regulation of TDEC in its coordination of a regional investigation and necessary remediation.

At our meeting, the Steering Committee delivered its RA/FI Phase II Report providing our specific findings and recommendations. The primary finding is that removal activities are complete, and the primary recommendation is that future jurisdiction for further investigation and remediation at the site should be under the regulation of TDEC as part of its regional investigation and remediation. We agreed that a follow-up meeting after completion of EPA's review of the report would aid timely pursuit of continued action and maintaining project momentum. We suggest this meeting be prior to EPA's final comments and with representatives of TDEC present.


We also want to express our appreciation for your action to try to maintain access to the Saad Site and to restrict use of the property by Ellis Saad or others. Please let us know the current status of access.

Again, thank you for your assistance. If you or others at EPA have questions about the report or this letter, please call Drew Goddard at (615) 742-6224 or Steve Dunn at (615) 361-2196.

Sincerely,

SAAD SITE STEERING COMMITTEE


Chairman of the Executive Committee


Chairman of the Technical Committee